

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ABIGAIL ESQUIBEL, TAMMY SEARLE, JEREMY WAHL, AIMEN HALIM and NICHOLAS SALERNO, individually and on behalf of all others similarly situated,

Plaintiffs,
v.

COLGATE-PALMOLIVE CO., and TOM'S OF MAINE, INC.,

Defendants.

Case No. 1:23-cv-00742-RA

**NOTICE OF MOTION TO
DISMISS THE AMENDED
COMPLAINT**

Oral Argument Requested

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Amended Complaint and the Certification of Jaclyn DeMais, Esq., and all exhibits thereto, Defendants Colgate-Palmolive Co. and Tom's of Maine, Inc. by their undersigned counsel, hereby move this Court before the Honorable Ronnie Abrams at the United States District Court, Southern District of New York, 40 Foley Square, New York, NY 10007, at a date and time to be determined by the Court, for an order dismissing Plaintiff's Amended Complaint in its entirety pursuant to Rules 12(b)(6), 12(b)(1), and 9(b) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

GREENBERG TRAURIG, LLP

Dated: May 5, 2023

By: /s/ Keith E. Smith

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